

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

IN RE APPLICATION OF MAKHPAL
KARIBZHANOVA FOR JUDICIAL
ASSISTANCE PURSUANT TO 28 U.S.C. §
1782

Case No.
ECF Case

**DECLARATION OF JOHN W. MOSCOW IN SUPPORT OF APPLICATION
FOR JUDICIAL ASSISTANCE PURSUANT TO 28 U.S.C. § 1782**

JOHN W. MOSCOW declares under penalty of perjury the following:

1. I am an attorney licensed to practice law in the State of New York and am senior counsel in the law firm Lewis Baach Kaufmann Middlemiss PLLC (“LBKM”). LBKM is counsel to petitioner Makhpal Karibzhanova (“Makhpal”).

2. I make this declaration in support of Makhpal’s Application for Judicial Assistance Pursuant to 28 U.S.C. § 1782 (the “Application”) brought in support of the May 17, 2021 action pending in Kazakhstan for division of marital assets (“Kazakh Proceeding”).

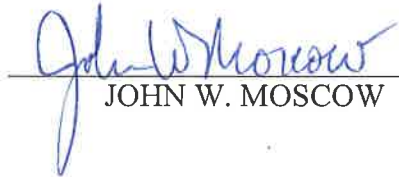
3. I incorporate by reference all relevant facts set forth in my May 11, 2021 declaration in support of Makhpal’s petition for an order of judicial assistance pursuant to 28 U.S.C. § 1782 in the Southern District of New York (the “S.D.N.Y. Application”), filed in the S.D.N.Y. matter as ECF No. 5 and attached to the instant Application as Exhibit A at p. 59.

4. I make the assertions supporting this Application based on public and non-public documents I have reviewed and conversations with investigators and eyewitnesses to the transactions described in the Application. I rely on the investigation and analysis conducted by attorneys at LBKM, with other skilled legal and financial professionals retained to consult in this matter.

5. The investigation has established that persons, entities, and evidence relevant to the Kazakh Proceeding are based in or working remotely from the Eastern District of New York, and are properly subject to subpoena under an order granting this Application.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: July 13, 2021


JOHN W. MOSCOW